

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION

DYFAN LLC,

Plaintiff,

v.

TARGET CORPORATION,

Defendant.

C.A. No. 6:19-cv-00179-ADA

**JURY TRIAL DEMANDED**

DECLARATION OF TIMOTHY DEVLIN  
IN SUPPORT OF PLAINTIFF'S  
RESPONSIVE CLAIM CONSTRUCTION BRIEF

1. I make this Declaration of my own free will.
2. I am an attorney with the law firm Devlin Law Firm LLC and am licensed to practice law in Delaware, District of Columbia, New York, and before the U.S. Patent and Trademark Office.
3. I represent Plaintiff Dyfan LLC and submit this declaration in support of Plaintiff's Responsive Claim Construction Brief, filed concurrently herewith.
4. Attached hereto as ***Exhibit 1*** is a true and correct copy the Declaration of Benjamin F. Goldberg, *Typemock, Ltd. v. Telerik, Inc.*, No. 17-10274-RGS, 2018 U.S. Dist. LEXIS 149110 (D. Mass. Aug. 31, 2018).
5. Attached hereto as ***Exhibit 2*** is a true and correct copy of the Declaration of Dr. Benjamin Goldberg in Support of Plaintiff Advanced Ground Information Systems, Inc.'s Opening Claim Construction Brief, *Advanced Ground Info. Sys. v. Life360, Inc.*, No. 14-80651-CV, 2014 U.S. Dist. LEXIS 187770 (S.D. Fla. Nov. 21, 2014).

6. Attached hereto as ***Exhibit 3*** is a true and correct copy of the excerpts from the Deposition of Dr. Benjamin Goldberg, in the Matter of: *Dyfan LLC v. Target Corp.* (Nov. 12, 2019).

7. Attached hereto as ***Exhibit 4*** is a true and correct copy of excerpts of U.S. Patent Application No. 13/410,197 containing Amendments B (filed Jan. 7, 2016), D (filed Aug. 25, 2016), and E (filed Nov. 22, 2016).

8. I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 22, 2019

/s/ Timothy Devlin

Timothy Devlin